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Attorneys for Defendant JAMES P. DORAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BROOK M. HURD, GERALDINE C. HURD,
AND M.H., A MINOR, BY AND THROUGH
HER GUARDIAN AD LITEM, BROOK M.
HURD; LUIS O. VILLALOBOS; OLIVIA N.
ESPINOZA; AND L.M.V., A MINOR, BY AND
THROUGH HIS GUARDIAN AD LITEM
OLIVIA N. ESPINOZA;

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,
JAMES P. DORAN, SHAWN PAQUETTE,
AND KRISTY KELLER

Defendants.

Case No. 2:16-cv-02011-GMN-NJK

**STIPULATION AND
[PROPOSED] ORDER TO MODIFY THE
SCHEDULING ORDER**

[THIRD REQUEST]

1 WHEREAS, on March 2, 2018 the parties filed a Joint Stipulation and Proposed Order to
2 Modify the Scheduling Order (ECF Doc. 109) and the Order was signed by this Court on March
3 7, 2018 (ECF Doc. 110); and

4 WHEREAS, the Order extended the deadline for the Supplemental Reports of Plaintiffs'
5 Experts to April 13, 2018; and

6 WHEREAS, the Order continued the deadline for the Supplemental Rebuttal Reports of
7 Defendants' Experts to April 27, 2018; and

8 WHEREAS, the Order continued the deadline by which Expert Depositions must be
9 completed to May 25, 2018; and

10 WHEREAS, the Order continued the deadline by which Dispositive Motions must be
11 filed to June 22, 2018; and

12 WHEREAS, the parties just concluded the depositions of Defendant CCSD's 30(b)(6)
13 witnesses on March 19, 2018; and

14 WHEREAS, the experts for the parties have received the transcripts from twenty-eight
15 (28) depositions since their original reports were prepared and require additional time to review
16 and consider the testimony and prepare supplemental reports; and

17 WHEREAS, counsel for plaintiffs Marianne Lannuti has a prepaid vacation and is
18 scheduled to be out of the country from April 8, 2018 through April 25, 2018; and

19 WHEREAS, counsel for plaintiffs Peter Alfert has a prepaid vacation and is scheduled to
20 be out of the country from May 1, 2018 to May 19, 2018;

21 IT IS HEREBY STIPULATED by and between the parties to the above-entitled action
22 that the deadlines are briefly extended as follows:

- 23 1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two
24 (2) weeks to **April 27, 2018**;
- 25 2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be
26 extended by two (2) weeks to **May 11, 2018**;
- 27 3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to
28 **June 8, 2018**;

1 4. The deadline for Dispositive Motion shall be extended by four (4) weeks to **July 20,**
2 **2018;**

3
4 Date: March 27, 2018

LAW OFFICES OF PETER W. ALFERT

5 By: s/ Peter W. Alfert
6 PETER W. ALFERT
7 IAN A. HANSEN
Attorneys for Plaintiff

8 Date: March 27, 2018

LAW OFFICES OF MARIANNE C. LANUTI

9
10 By: s/ Marianne C. Lanuti
11 MARIANNE C. LANUTI
Attorneys for Plaintiff

12 Date: March 27, 2018

GREENBERG TRAUIG

13 By: s/ Kara B. Hendricks
14 KARA B. HENDRICKS
15 Attorneys for Defendants Clark County School
District, Shawn Paquette, and Kristy Keller

16 Date: March 27, 2018

HATFIELD & ASSOCIATES

17
18 By: s/ Trevor J. Hatfield
19 TREVOR J. HATFIELD
Attorneys for James P. DORAN

20 Date: March 27, 2018

HALL, JAFFE & CLAYTON LLP

21
22 By: s/ Michelle R. Schwarz
23 STEVEN T. JAFFE
24 MICHELLE R. SCHWARZ
Attorneys for Defendants Clark County School
District, Shawn Paquette, and Kristy Keller

1 [PROPOSED] ORDER

2 Pursuant to the Stipulation of the Parties, and good cause appearing, the following deadlines
3 are briefly extended as follows:

- 4 1. The deadline for **Supplemental Reports of Plaintiffs' Experts** shall be extended by two
5 (2) weeks to **April 27, 2018**;
- 6 2. The deadline for **Supplemental Rebuttal Reports of Defendants' Experts** shall be
7 extended by two (2) weeks to **May 11, 2018**;
- 8 3. The deadline to complete **Expert Depositions** shall be extended by two (2) weeks to
9 **June 8, 2018**;
- 10 4. The deadline for Dispositive Motion shall be extended by four (4) weeks to **July 20,**
11 **2018**;

12 **IT IS HEREBY ORDERED**

13
14 Dated: April 2, 2018

15 
16 UNITED STATES MAGISTRATE JUDGE